REMARKS

This Application has been carefully reviewed in light of the Office Action mailed September 17, 2003 ("Office Action"). At the time of the Office Action, Claims 1-26 were pending in the application. In the Office Action, the Examiner rejects Claims 1-26. Applicants amend Claims 1, 9, 15, and 21 to advance prosecution in this case. Applicants do not admit that these amendments were necessary as a result of any cited art or that these amendments narrow the scope of the amended Claims.

Consideration of Information Disclosure Statements

Applicants mailed an Information Disclosure Statement on April 22, 2002, which was received by the U.S. Patent and Trademark Office on May 2, 2002. The IDS was filed before the mailing of a first Office Action on the merits. On the PTO Form-1449 indicating consideration of the IDS, the Examiner did not initial all of the references to indicate that they had been considered. Specifically, the Examiner did not initial the Other Art section on page 2. Applicants respectfully request the Examiner to consider all of the art cited in the IDS dated April 22, 2002, and in the event a patent issues on this Application, that this art be printed on the face of the issued patent. Furthermore, Applicants respectfully request a copy of the PTO Form-1449 for the IDS indicating the Examiner's consideration of the references.

Section 102 Rejections

The Examiner rejects Claims 1-26 under 35 U.S.C. § 102(b), as being anticipated by U.S. Patent No. 5,787,245 issued to You et al. ("*You*"). Applicants respectfully request reconsideration and allowance of Claims 1-26. Amended Claim 1 recites "a second PTE configured to receive and send threads, each thread comprising a plurality of executable program fragments." The quoted limitation is not described, either expressly or inherently, in *You*. The Examiner asserts that the server debugger of *You* shows the recited second PTE. But contrary to the Examiner's assertion, the server debugger of *You* does not "receive and send threads, each thread comprising a plurality of executable program fragments." The cited portions of *You* (referred to as listener threads in Fig. 14) "receive events from the operating system which, in turn, become asynchronous notification which is sent to the debugger client" (60:36-40). The events result from the execution of a target process (60:44-46), and those events are not themselves executable, so they do not comprise "a plurality of executable program fragments." Furthermore, the server debugger communicates notifications to the client debugger by reverse connection (60:46-47), but it does not communicate the threads themselves. In fact, as noted in *You*, col. 60, lines 47-49, "the thread is destroyed by the server." Therefore, the server debugger is not "configured to receive and send threads."

Nor do the deficiencies of *You* end there. Amended Claim 1 also recites "a third PTE configured to receive and send the threads." The Examiner asserts that the listener thread shows the recited third PTE, but *You* describes the listener threads as processes of the server debugger (60:40-44), not as a separate programming environment. Thus, the listener thread does not show the recited third PTE. From the arguments presented above, it is clear that *You* does not describe, either expressly or inherently, each and every element of Claim 1. Therefore, *You* does not anticipate Claim 1. For at least these reasons, Applicants respectfully submit that Claim 1 and its dependent claims are allowable over *You*, and Applicants accordingly request reconsideration and allowance of Claim 1 and its dependent claims.

Amended Claims 9 and 21 recite "intercepting threads passed from a first PTE to a second PTE, each thread comprising a plurality of executable program fragments," while amended Claim 15 recites "means for intercepting threads passed from a first PTE to a second PTE, each thread comprising a plurality of executable program fragments." The quoted limitations are not described, either expressly or inherently, in *You*. As explained

above, the client debugger and the server debugger of *You* do not pass "threads comprising a plurality of executable program fragments" to one another. Nor does the listener thread show either of the recited PTEs, since it is not a separate programming environment and since it does not pass threads to PTEs. Since *You* does not even describe threads comprising a plurality of executable program fragments that are passed between PTEs, it cannot possibly describe the quoted limitations of Claims 9, 15, and 21. For at least these reasons, Applicants respectfully submit that Claims 9, 15, and 21 are allowable over *You*, and accordingly, Applicants respectfully request reconsideration and allowance of Claims 9, 15, and 21, as well as their respective dependent claims.
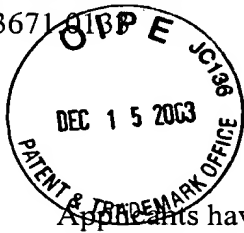
CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Samir A. Bhavsar, Attorney for Applicant, at the Examiner's convenience at (214) 953-6581.

Although no fees are believed due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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